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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

19 KENNETH LANE, *et al.*,

Case No.: 2:20-cv-01716-APG-BNW

20 Plaintiffs,

STIPULATION AND [PROPOSED]
ORDER TO EXTEND THE TIME
FOR DEFENDANT PROVIDENT
TRUST GROUP, LLC TO
RESPOND TO COMPLAINT

21 v.

22 CONESTOGA SETTLEMENT SERVICES,
23 LLC, *et al.*,

24 Defendants.

25 Plaintiffs, by and through their counsel of record, Reese Marketos LLP and King &
26 Durham, PLLC, and Defendant Provident Trust Group, LLC (“Provident”), by and through
27 its counsel of record, Greenberg Traurig, LLP, hereby stipulate to an extension of time by
28 which Provident must respond to the Complaint by thirty (30) days up to, and including,
November 9, 2020 (November 8 being a Sunday). This Stipulation is made and based upon
the following:

29 1. Plaintiffs filed their Complaint on September 17, 2020, in which they allege
30 that Defendants engaged in tortious conduct and misrepresented certain aspects of life
31 settlement investments. ECF No. 1. Plaintiffs seek certification to represent a class of
32 similarly situated individuals across the country. *Id.*

1 2. Provident was served with the Complaint on September 18, 2020. Provident's
2 response is currently due October 9, 2020.

3 3. Counsel for Provident represent that they have recently been engaged and
4 require additional time to evaluate Plaintiffs' allegations and prepare a response, taking into
5 account the exercise of due diligence.

6 4. In light of the foregoing, the parties agree and request that Provident shall
7 have up to, and including, **November 9, 2020**, to respond to the Complaint.

8 5. Provident thus requests that the Court accept this Stipulation and enter this
9 proposed order. This is the first request for an extension of time. This Stipulation is entered
10 into in good faith and not for purposes of delay.

11 **IT IS SO STIPULATED.**

12 DATED this 2nd day of October 2020.

13 GREENBERG TRAURIG, LLP

14 _____
15 */s/ Jason K. Hicks*

16 Mark F. Ferrario, Esq.
17 Jason K. Hicks, Esq.

18 **Attorneys for Defendant**
19 **Provident Trust Group, LLC**

12 DATED this 2nd day of October 2020.

13 REESE MARKETOS LLP

14 _____
15 */s/ Brett S. Rosenthal*

16 Adam Sanderson, Esq.
17 Brett S. Rosenthal, Esq.

18 Gregory H. King, Esq.
19 Matthew Durham, Esq.
20 KING & DURHAM PLLC

21 **Attorneys for Plaintiffs**

22 **IT IS SO ORDERED.**

23 _____
24 *Brett S. Rosenthal*

25 UNITED STATES DISTRICT JUDGE

26 DATED: October 6, 2020.